

Exhibit 2

Confidential – Subject to The Protective Order
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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 CASE NO. 18-MD-2865 (LAK)

4 IN RE:)
5)
6)

5 CUSTOMS AND TAX ADMINISTRATION OF)
6 THE KINGDOM OF DENMARK)
7 (SKATTEFORVALTNINGEN) TAX REFUND)
8 SCHEME LITIGATION)
9)

This document relates to case nos.)
19-cv-01783; 19-cv-01788; 19-cv-01794;)
19-cv-01798; 19-cv-01918)

12 C O N F I D E N T I A L

13 SUBJECT TO THE PROTECTIVE ORDER

15 CONTINUED REMOTE VTC VIDEOTAPED DEPOSITION UNDER

16 ORAL EXAMINATION OF

17 JOHN VAN MERKENSTEIJN

18 VOLUME II

19 DATE: April 20, 2021

24
25 REPORTED BY: MICHAEL FRIEDMAN, CCR

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1 as a defense in this -- in these actions?

2 A Early on, we had another law firm
3 involved. I'm bad on names, so I am trying
4 to remember the name, and I'll think of it in
5 a minute.

6 Crowell & Moring.

7 Q When you say "early on" --

8 A I'm trying to --

9 Q I'm sorry. If I can stop you on
10 that one.

11 You mentioned early on you used
12 Crowell & Moring.

13 During what period of time?

14 A They were involved at the time we
15 first started working with Solo.

16 Q Did you receive advice from Crowell
17 & Moring that you were relying on as a
18 defense in these actions?

19 A I can't -- I can't -- I'm just
20 telling you what law firms we used. I don't
21 know what we're relying on in this action.

22 MS. MCCARTHY: Marc, I'm going to
23 object. We've done a broad waiver of
24 attorney/client privilege and we've
25 asserted a reliance defense. So I